

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, both
individually and as Legal Guardian of
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

vs.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

Case No. 8:18-cv-00127

**MOTION FOR WITHDRAWAL OF COUNSEL
FOR THE GOODYEAR TIRE & RUBBER COMPANY**

The Goodyear Tire & Rubber Company (“Goodyear”) hereby moves pursuant to Nebraska General Rule 1.3(f) to withdraw Jayne Anderson Risk, Justin E. Kerner, and DLA Piper LLP (US) as counsel for Goodyear. In support thereof, Goodyear states as follows:

1. Ms. Risk, Mr. Kerner, and DLA Piper LLP (US) (collectively “DLA Piper”) have acted as counsel for Goodyear in this case.

2. On or about July 18, 2017, this case was filed in the Court of Common Pleas of Philadelphia County. The case was subsequently removed to the United States District Court for the Eastern District of Pennsylvania.

3. On or about March 22, 2018, the United States District Court for the Eastern District of Pennsylvania ordered, pursuant to a stipulation of the parties, that the case be transferred to the United States District Court for the District of Nebraska.

4. On April 6, 2018, Edward S. Bott, Jr. of Greensfelder, Hemker & Gale, P.C. was admitted pro hac vice to this Court to appear on behalf of Goodyear.

5. On April 12, 2018, Jennifer D. Tricker of Baird Holm LLP entered her appearance on behalf of Goodyear.

6. DLA Piper now seeks to withdraw as counsel of record for Goodyear. (See Declarations of Jayne Anderson Risk and Justin E. Kerner in Support of Goodyear's Motion For Withdrawal of Counsel, concurrently filed herewith.)

7. Goodyear has been given notice of DLA Piper's withdrawal.

8. Goodyear will continue to be represented by Edward Bott and Jennifer Tricker and their respective law firms.

9. This motion will not cause any unnecessary delay, prejudice, or material adverse effect on the interests of any party.

10. Accordingly, good cause exists for DLA Piper to be withdrawn from the representation of Goodyear.

WHEREFORE, Goodyear respectfully requests this Court enter an Order granting this Motion to Withdraw Ms. Risk, Mr. Kerner, and DLA Piper as Counsel for The Goodyear Tire & Rubber Company, and relieve Ms. Risk, Mr. Kerner, and DLA Piper of any future obligations as to the representation of Goodyear in this case.

Dated: April 18, 2018

Respectfully submitted,

By: s/ Edward S. Bott, Jr.
GREENSFELDER, HEMKER & GALE, P.C.
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and

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*Attorneys for The Goodyear Tire & Rubber
Company*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 18, 2018, the foregoing Motion for Withdrawal of Counsel for The Goodyear Tire & Rubber Company was filed electronically and served via operation of the Court's CM/ECF system and via email on the following:

<p>Daniel J. Sherry, Jr. EISENBERG, ROTHWEILER, WINKLER, EISENBERG & JECK, P.C. 1634 Spruce Street Philadelphia, PA 19103 Daniel@erlegal.com <i>Attorney for Plaintiffs</i></p>	<p>Jayne Risk Justin E. Kerner DLA PIPER LLP (US) 1650 Market Street, Suite 4900 One Liberty Place Philadelphia, PA 19103 jayne.risk@dlapiper.com justin.kerner@dlapiper.com <i>Attorneys for Defendant</i></p>
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The undersigned further certifies that a true and correct copy of the foregoing Motion was served via certified mail to:

Litigation Department
The Goodyear Tire & Rubber Company
200 Innovation Way
Akron, OH 44316

s/ Edward S. Bott, Jr.

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